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Attorneys for Plaintiffs
 Bridgestone Americas Holding, Inc.,
 Bridgestone Firestone North American Tire, LLC,
 Bandag, Incorporated, and Pirelli Tire, LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

IN RE RUBBER CHEMICALS LITIGATION) MDL Docket No. C 04-1648 MJJ
) Individual Case No. C 06-5700 MJJ
)
)

THIS DOCUMENT RELATES TO:) **STIPULATION TO CONTINUE**
) **HEARING ON MOTION TO DISMISS**
) **AND EXTEND BRIEFING SCHEDULE**
) **PURSUANT TO CIVIL LOCAL RULE**
) **6-2 AND [REDACTED] ORDER**

Bridgestone Americas Holding, Inc., et al.
v. Chemtura Corporation, et al.

Pursuant to Civil Local Rule 6-2 of the United States District Court for the Northern District of California, counsel for Plaintiffs Bridgestone Americas Holding, Inc., Bridgestone Firestone North America Tire, LLC, Bandag, Incorporated, and Pirelli Tire, LLC (collectively, "Plaintiffs") and Defendants Chemtura Corporation (formerly known as Crompton Corporation) and Uniroyal Chemical Company, Inc. (collectively, "Defendants") submit this Stipulation and [Proposed] Order;

WHEREAS, Plaintiffs' action, *Bridgestone Americas Holding, Inc., et al. v. Chemtura Corporation, et al.*, was transferred from the Middle District of Tennessee pursuant to 28 U.S.C. § 1407(c), and docketed with this Court on September 19, 2006;

WHEREAS, an amended complaint was filed on September 22, 2006;

WHEREAS, a motion to dismiss the amended complaint was filed by Defendants on November 13, 2006;

WHEREAS, under the current schedule, Plaintiffs' opposition brief to the motion to dismiss is due on December 18, 2006, Defendants' reply brief is due on January 12, 2007, and the hearing on the motion to dismiss is set for February 6, 2007.

WHEREAS, Bridgestone Americas Holding, Inc., Bridgestone Firestone North America Tire, LLC and Defendants have recently reached a preliminary settlement;

WHEREAS, the parties have agreed to an extension of time for the filing of the opposition and reply briefs, in addition to a continuance of the hearing on the motion to dismiss to facilitate the on-going settlement discussions;

NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED BETWEEN THE PARTIES, BY AND THROUGH THEIR COUNSEL OF RECORD, THAT:

1. Plaintiffs shall file and serve their opposition brief to the motion to dismiss on December 29, 2006.
2. Defendants shall file and serve their reply brief on January 26, 2007.
3. The hearing on the motion to dismiss shall be continued to February 13, 2007 at 9:30 a.m. before the Honorable Martin J. Jenkins in courtroom 11,

located at the above entitled courthouse.

IT IS SO STIPULATED.

Dated: December 13, 2006

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Dated: December 15, 2006

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Attorneys for Defendants Chemtura Corporation
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Uniroyal Chemical Company, Inc

*Admitted in New York Only

1 **GOOD CAUSE APPEARING THEREFOR, IT IS SO ORDERED,**

2 DATED: 12/18/2006

BY:



HON. MARTIN J. JENKINS
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
CALIFORNIA

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